



May 23, 2018

Chairman Ajit Pai
Commissioner Mignon Clyburn
Commissioner Michael O’Rielly
Commissioner Brendan Carr
Commissioner Jessica Rosenworcel
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Mr. Chairman and Commissioners,

After an active season of winter and spring storms, Harris County prepares for hurricane season by continuing to look for better ways to inform our residents. We applaud the efforts the FCC put forth at the start of the year to enhance the geo-targeting capabilities of the Wireless Emergency Alerts (WEA) system. However, those capabilities will not be implemented until 2019. We must continue to look at ways to improve the WEA system to create a strong and adaptable tool. Today, we are writing to express our concern that multimedia enhancements have not been approved as a critical update for the WEA system.

In this age of instant access to visual information via social media applications, we need to enhance our country’s ability to rapidly, efficiently and securely deliver comprehensive emergency information, including images, to the public. Pictures provide instant recognition and speak a universal language. Most importantly, they enable rapid response from every potential witness who could save countless lives through fast action. With the network upgrades to 5G, capacity for multimedia messages will be even greater, and we would be remiss not to advocate for multimedia capabilities for WEA to be in place as this upgrade occurs.

Harris County continues to recover from Hurricane Harvey’s flooding impacts. The flooding during Harvey affected areas that had previously not flooded and creating unique challenges that were difficult to communicate. Had multimedia capabilities been available for WEA messages, inundation maps, traffic maps and infographics with protective measures could have been sent to residents, alerting them to hazards they may not have been familiar with.

The Chelsea bombings in New York City also highlighted this major weakness in the WEA system. Millions of residents who wanted to help find the suspect were given no other option but to take additional time to search for his photo. In any emergency, time is often a commodity we cannot afford to waste.



Allowing for multimedia content in WEA messages would greatly increase the ability of public safety officials to reach residents with access and functional needs. While efforts are being made to address the need for multilingual communications in WEA messages¹, individuals who are deaf or hard of hearing need visual cues not currently available in WEA messages. “American Sign Language (ASL) is a complete, complex language that employs signs made by moving the hands combined with facial expressions and postures of the body. It is the primary language of many North Americans who are deaf and is one of several communication options used by people who are deaf or hard-of-hearing. ASL is a language completely separate and distinct from English. It contains all the fundamental features of language—it has its own rules for pronunciation, word order, and complex grammar.”²

On January 30, the FCC took the first step toward making the nation’s WEA system achieve these readily available technological upgrades. The adoption of geo-targeting standards will enhance the ability to send targeted messages, but without multimedia capability, the messages will still be limited in effectiveness. It is essential that we build on the progress already made by the FCC to continue improving the WEA system to its highest capacity. Allowing multimedia content, including thumbnail images and instructional infographics, in WEA messages on 4G, 5G and all future networks is not only necessary, but expected from the public.

Harris County Office of Homeland Security & Emergency Management (HCOHSEM) urges the FCC to act to meet the need for multimedia enhancements to WEA messages. Failure to do so leaves Harris County susceptible to more potential disasters without the ability to properly alert our residents. Failure to include these improvements to WEA limits our ability to serve the community that we are charged to protect. It will erode the trust of wireless alert originators to send a timely, informative message when life or death may be on the line.

We respectfully request that the FCC take immediate action to ensure that industry meet these standards before more lives are put at risk.

Sincerely,

A handwritten signature in black ink, appearing to read "FS", followed by a period.

Francisco Sanchez
Deputy Emergency Management Coordinator
Harris County, TX

¹ See FCC Report and Order, page 38, September 29, 2016

² See NIH NIDCD American Sign Language, <https://www.nidcd.nih.gov/health/american-sign-language>